

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

**Plaintiff,**

**V.**

**DEVON D. ARCHER, BEVAN T. COONEY,  
HUGH DUNKERLEY, JASON W. GALANIS,  
JOHN P. GALANIS, GARY T. HIRST and  
MICHELLE A. MORTON,**

## Defendants.

[illegible]

16 Civ. 3505 (WHP)

## ECF Case

**DECLARATION OF NANCY A. BROWN  
IN SUPPORT OF THE COMMISSION'S MOTION  
FOR LEAVE TO AMEND ITS COMPLAINT**

I, Nancy A. Brown, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the bar of the State of New York and of the bar of this Court. I am employed as Senior Trial Counsel in the Division of Enforcement at the New York Regional Office of Plaintiff Securities and Exchange Commission (“Commission”). I submit this Declaration in Support of the Commission’s Motion for Leave to Amend Its Complaint to add Francisco Martin as an additional Defendant. I am fully familiar with the facts and circumstances herein.

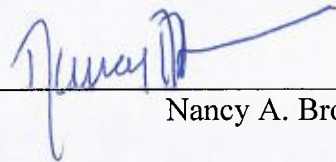
2. The Commission filed its initial Complaint in this action on May 11, 2016. A true and correct copy of that Complaint is appended hereto as Exhibit A. The Commission's proposed Amended Complaint is appended hereto as Exhibit B. A red-line version of the proposed Amended Complaint, marked to show changes from the Commission's initial Complaint, is appended hereto as Exhibit C.

3. On November 3, 2016, I contacted counsel for the Defendants in this action, or their CJA counsel in the parallel criminal action, United States v. Galanis, 16 Cr. 371 (RA)

(S.D.N.Y.), to seek their consent to our filing an Amended Complaint to add Mr. Martin as a Defendant. Defendants Dunkerley, John Galanis and Michelle Morton consented. I received no other responses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 4, 2016  
New York, New York



---

Nancy A. Brown